

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**CoSTAR REALTY INFORMATION, INC.,
22 Bethesda Metro Center, 10th Floor
Bethesda, Maryland 20814**

and

**CoSTAR GROUP, INC.
2 Bethesda Metro Center, 10th Floor
Bethesda, Maryland 20814**

Plaintiffs,

v.

CIVIL ACTION NO. AW -08-663

**Mark Field d/b/a Alliance
Valuation Group
2858 Via Bellota
San Clemente, California 92673,**

**LAWSON VALUATION GROUP, INC.
8895 N. Military Trail, Suite 304E
Palm Beach Gardens, Florida 33410-6263,**

**RUSS A. GRESSETT
5625 FM 1960 West, Suite 509
Houston, Texas 77069,**

**GERALD A. TEEL COMPANY, INC.
974 Campbell Rd., Suite 204
Houston, Texas 77024-2813, and**

**PATHFINDER MORTGAGE COMPANY
23172 Plaza Point Dr., Suite 285
Laguna Hills, California 92653,**

and

**JOHN DOES 1-4
Addresses Currently Unknown**

Defendants.

**DEFENDANT RUSS A. GRESSETT'S EMERGENCY
MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT AND
FILE CROSS-MOTION FOR SUMMARY JUDGMENT**

Defendant, Russ A. Gressett ("Gressett"), by and through his undersigned counsel, and pursuant to FED. R. CIV. P. 6(b) and applicable Local Rules, hereby files this instant Motion for Extension of Time to file his Response in Opposition to Plaintiffs' Motion for Summary Judgment ("Response") and to file any cross-Motion for Summary Judgment, and in support thereof, states as follows:

1. On or about March 13, 2008, Plaintiff commenced this action against, amongst others, Gressett.

2. Pursuant to the parties Joint Status Report [Doc. No. 74], Plaintiffs filed their Motion for Summary Judgment on November 2, 2009 [Doc. No. 85-1 and 85-2]. The Joint Status Report also requires Gressett to file his Response as well as any cross-motion for summary judgment by November 19, 2009. Due to unavoidable conflicts for undersigned counsel, Gressett requires additional time to complete both the Response and Cross-Motion for Summary Judgment.

3. Therefore, Gressett respectfully requests a brief extension to November 23, 2009, in order to file his Response to Plaintiffs' Motion for Summary Judgment and to file his own Cross-Motion for Summary Judgment.

4. Plaintiff will not be prejudiced by the relief sought herein. It will require no delay in the Court's or only a very minimal delay in any consideration of the parties' respective Motions. Conversely, if the relief sought herein is not granted, Gressett will be substantially prejudiced in that he and his counsel will be unable to fully prepare and file a Response to Plaintiffs' Motion for Summary Judgment which is dispositive and will be unable to affirmatively assert his own rights to

summary judgment with respect to Plaintiffs claims or his affirmative defenses. The extension is being sought in good faith and not for the purposes of delay alone but so that justice may be done.

5. On November 19, 2009, the undersigned counsel conferred with Plaintiff's counsel, William Sauers, regarding the relief sought herein and the reasons therefore. Plaintiff's counsel indicated his client has consented to the relief sought.

6. Gressett's proposed order is attached hereto as **Exhibit A**.

WHEREFORE, Defendant Gressett respectfully requests that this Court enter an Order granting it an extension of time until November 23, 2009, to file its Response to Plaintiffs' Motion for Summary Judgment and to file any Motion for Summary Judgment against Plaintiffs' claims or in favor of Gressett's affirmative defenses, as well as awarding Gressett such further relief as is necessary, just and proper.

Respectfully Submitted,

GREENBERG TRAURIG, L.L.P.

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**ATTORNEYS FOR DEFENDANT
RUSS A. GRESSETT**

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2009, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Christopher C. Miller
Christopher C. Miller

SERVICE LIST

CoStar Realty Information, Inc., et al v. Mark Field d/b/a Alliance Valuation Group, et al.

Case No. 8:08-CV-00663-AW

United States District Court, District of Maryland (Greenbelt Division)

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